

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

MARK MARTELL, on behalf of himself and all  
others similarly situated,

Plaintiff,

vs.

X CORP.,

Defendant.

Case No. 23-cv-5449

District Judge Rebecca R. Pallmeyer

Magistrate Judge Beth W. Jantz

**X CORP.'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER OR  
OTHERWISE RESPOND TO THE COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), Defendant X Corp. respectfully moves for an unopposed 35-day extension of time, until September 25, 2023, to answer or otherwise respond to the Complaint. In support, X Corp. states as follows:

1. On or about July 11, 2023, Plaintiff filed a Class Action Complaint ("Complaint") in the Circuit Court of Cook County, Illinois, captioned *Martell v. X Corp.*, Case No. 2023CH06416. *See* Dkt. No. 1-2.

2. On July 14, 2023, Plaintiff purported to effectuate service on X Corp. *See* Dkt. No. 1-3.

3. On August 14, 2023, X Corp. timely removed the action to this Court, *see* Dkt. No. 1, setting X Corp.'s initial deadline to answer or otherwise respond to the Complaint as August 21, 2023 pursuant to Federal Rule of Civil Procedure 81(c)(2)(C).

4. To allow X Corp. the time to most efficiently and effectively respond to the Complaint, X Corp. respectfully requests an extension until September 25, 2023, to answer or otherwise respond to the Complaint. The requested extension will not prejudice either party and

will serve the interests of judicial efficiency and conservation of resources. No previous extension has been requested for this deadline.

5. X Corp.'s counsel has conferred with Plaintiff's counsel, and Plaintiff's counsel indicated that Plaintiff does not oppose the relief requested in this motion.

WHEREFORE, X Corp. respectfully requests that this Court grant this unopposed motion and extend the deadline for X Corp. to answer or otherwise respond to the Complaint until September 25, 2023.

Dated: August 16, 2023

Respectfully submitted,

/s/ Robert C. Collins III

Robert C. Collins III, one of the Attorneys for  
Defendant X Corp.

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**CERTIFICATE OF SERVICE**

I, Robert C. Collins III, hereby certify that I caused a copy of the foregoing to be served on the parties listed below, by operation of the Court's CM/ECF system, on August 16, 2023.

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Dated: August 16, 2023

/s/ Robert C. Collins III

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